

Alliance for Telecommunications
Industry Solutions

*Problem Solvers to the
Telecommunications Industry*

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Federal Communications Commission
Office of Secretary

October 15, 1996

William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

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Re: CC Docket 92-237: In the Matter of Administration of the
North American Numbering Plan; Nominations to the
North American Numbering Council Working Groups and
Task Forces

Dear Mr. Caton:

On October 4, 1996, the Federal Communications Commission ("FCC" or "Commission") released a public notice in CC Docket No. 92-237: In the Matter of Administration of the North American Numbering Plan, requesting nominations to the North American Numbering Council ("NANC") Working Groups and Task Forces. The Alliance for Telecommunications Industry Solutions ("ATIS") submits Susan M. Miller, ATIS Vice President and General Counsel and NANC Special Member, and John C. Manning, Director, Industry Forums, as her alternate, to the North American Numbering Plan ("NANP") Administration Working Group. In addition, ATIS recommends Ms. Miller, with assistance from Mr. Manning, serve as a co-leader of the NANP Administration Working Group. Finally, ATIS offers the assistance of Mr. George L. Edwards, ATIS President, for the Dispute Resolution Task Force, should this Task Force wish to learn about the experience of the ATIS industry committees with respect to dispute resolution.

ATIS is uniquely positioned to offer its services both as a leader of the NANP Administration Working Group and as active participant. ATIS has as its central mission to actively promote the timely resolution of national and international issues involving telecommunications standards and the development of operational guidelines. To accomplish this mission, ATIS sponsors a number of industry forums which address technical and/or operational issues concerning numbering, dialing and the planning and administration of the NANP. A significant role has been played by the Industry Numbering Committee ("INC"), a committee

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residing under ATIS Carrier Liaison Committee ("CLC"). INC is the primary vehicle used by the industry to address and resolve issues by consensus associated with the planning, administration, allocation and assignment and use of numbering resources. This committee has developed numerous guidelines that assist the current NANP Administration and the industry with assignment and use of numbering resources. Numbering issues regarding toll free resources and abbreviated dialing have also been addressed by ATIS-sponsored committees.

As a special (non-voting) member of the NANC, ATIS is especially well-positioned to serve in a leadership capacity. The voting membership of the NANC have a vested interest in the ultimate determination of the NANP Administration as users of NANP resources. Such is not the case with ATIS. ATIS does not represent the parochial interests of its membership per se. As a sponsor of industry forums such as the CLC, Committee T1, the Information Industry Liaison Committee and the Network Reliability Steering Committee, ATIS's expertise is in providing a consensus resolution process and facilitating industry committees in reaching that consensus resolution. ATIS also has strong record in providing administrative support to active industry committees, experience which could assist this effort.

In this connection, ATIS' candidates on the NANP Administration Working Group are well qualified to serve in a leadership role. Ms. Miller and her alternate representative Mr. Manning have extensive experience in facilitating and moderating industry meetings. The specifics of their background are detailed below.

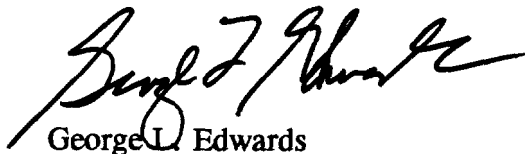
Ms. Miller has been the General Counsel of ATIS since 1988. She served as outside counsel for the organization from 1984-1988. Ms. Miller is well-positioned to serve in a leadership role as she has had the unique experience of advising often contentious industry committees while facilitating consensus resolution of their issues. She has worked closely with the ATIS INC and the Industry Carriers Compatibility Forum ("ICCF"). Ms. Miller also has experience with federal advisory committees. She advises the Network Reliability Steering Committee which supported the activities of the FCC's Network Reliability Council, and now supports the Network Reliability and Interoperability Council ("NRIC"). In addition, she is a participant on the NRIC's Focus Group I. ATIS would support Ms. Miller serving as the leader of the NANP Administration Working Group.

Mr. Manning has been directly involved with number assignment and administration issues since 1987. Participating in a variety of industry fora addressing numbering matters over the past nine years, he also served as the first chair of the Industry Numbering Committee. Over this time frame, he has worked with the current North American Numbering Plan Administration and is very familiar with its responsibilities, functions and processes. His current responsibilities include the overall management and support of the ATIS Carrier Liaison Committee, of which the INC is a subtending committee, and other ATIS-sponsored committees. Finally, ATIS would support Mr. Manning activities in the NANP Administration Working Group.

Finally, as stated earlier, ATIS offers the assistance of Mr. George L. Edwards, ATIS President, as a participant on the Dispute Resolution Task Force. Mr. Edwards has been the President of ATIS since 1990. In this role, he has much experience with industry committees and in particular, could share the insights and experience of the ATIS committees with the dispute resolution processes. Should the Dispute Resolution Task Force find such information to be of assistance in its deliberations, Mr Edwards is prepared to participate.

Susan Miller can be reached at the Alliance for Telecommunications Industry Solutions, 1200 G St. NW, Suite 500, Washington, DC 20005, Phone: 202-434-8828, Fax: 202-393-5481; E-Mail: smiller@atis.org. George Edwards (phone: 202-434-8820; fax: 202-393-5481; e-mail: gedwards@atis.org) and John Manning (phone: 202-434-8842; fax: 202-393-5453; e-mail: jmanning@atis.org) can be reached at the same address.

Sincerely,

A handwritten signature in black ink, appearing to read "George L. Edwards", with a stylized flourish at the end.

George L. Edwards
President

cc: International Transcription Services